

October 4, 2005

The following comments on the Detailed Analysis of Alternatives Technical Memorandum were submitted by telephone by Dan Miller to Carol Deck, and resolved during the discussion:

Page 7, first paragraph after numbered list: Change paragraph to reflect that some institutional controls may be necessary even if groundwater contamination is below MCLs or indoor air volatilization PRGs can be met.

Resolution: Change language to insert the underlined words:

In the future, groundwater monitoring may indicate that some of these institutional controls may no longer be necessary if residual groundwater contamination is below MCLs or the indoor air volatilization PRGs can be met. The need for institutional controls will be evaluated as part of future CERCLA periodic reviews.

Page 11, first full sentence: Sentence is not needed because ARARs are already met.

Resolution: Keep sentence, including EPA's comment to change last phrase from "no further action can be taken" to a reference that all feasible actions have been taken.

Page 11, references to federal laws and regulations: Add references to the equivalent Colorado laws and regulations. Changes made.

Page 13, first full paragraph: Change "borrowing" to "burrowing." Change made.

Page 17, section 3.4.6: Replace "legally enforceable deed restrictions" with "an environmental covenant." Change made.

Page 22, section 4.1.6, conclusion: Change last sentence to "In conclusion for this criterion, Alternatives 1 and 2 are both easily implementable." Change made.

In general, the substance and conclusions of the Tech Memo are acceptable, and Mr. Miller may have additional comments when the draft RI/FS is issued.

Additional Comment made on October 5: Alternative 1 is the no further action alternative, with monitoring. Because an environmental covenant would be considered part of a response action, it should not be included in the no further action alternative. Without the covenant, Alternative 1 would not comply with the State environmental covenant law ARAR. Alternative 1 would include the environmental covenant for the Present Landfill, but not other areas of the site.

Resolution: I agreed to pass on the comment to K-H management and RFPO.

ADMIN RECORD

CADeck, 10/4/2005, revised 10/6/2005

SW-A-005263

1/4

Brooks, Laura

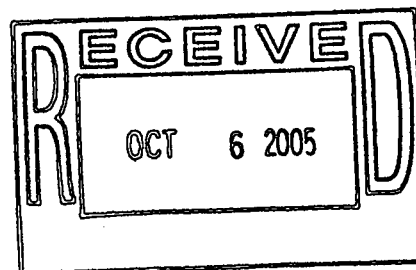
From: Carl Spreng [cspreng@smtpgate.dphe.state.co.us]
Sent: Thursday, October 06, 2005 3:00 PM
To: Brooks, Laura
Cc: Aguilar, Mark; ross.lorraine@epa.gov; Rampe, John; Walstrom, Jan; David Kruchek; dan.miller@state.co.us
Subject: DAA TM comments



DAA TM comments
(4Oct05).doc

I understand that your responses to comments from others may make some of these comments moot.

Carl



CDPHE comments on
CMS-FS Detailed Analysis of Alternatives Technical Memorandum
(September 20, 2005)

Section 3.1.1

The text should mention that inclusion of this No Further Action alternative is a CERCLA requirement.

Sections 3.1.2 and 3.4.1

The 5 institutional controls listed in these 2 sections should be modified to include the institutional controls agreed to in the IM/IRAs for the Present Landfill and the Original Landfill. The following modifications are proposed:

2. Prohibition on drilling wells into contaminated groundwater or at the landfills for drinking water or irrigation use (specifically for drinking water or irrigation use).
[IC #3 seems redundant with the intent of IC#2 and could be eliminated.]
4. Restrictions on excavation in areas above subsurface contamination or intrusion into subsurface contamination. No excavation is allowed at-on or in the immediate vicinity of the Present Landfill and the Original Landfill.

The following additional institutional/physical controls are proposed to make this list agree with the landfill IM/IRAs:

- Prohibition on disruption of groundwater or leachate collection and treatment systems.
- Prohibition on roads and trails on landfill covers or in the immediate vicinity of the covers.
- Fencing may be installed around the landfills covers to limit the potential for damage or tampering.

Since these are lists of institutional and physical controls, the last sentence in Section 3.4.1 could be modified per the landfill IM/IRAs and included in the numbered list:

- Signage will also be installed as a physical control along the perimeter of the IA OU to notify the WRW and WRV that they are at the boundary of the Refuge maintained by the USF&WS; to indicate that vehicles are prohibited from specific areas; to delineate landfill boundaries; to outline digging, fishing, swimming, groundwater, surface use and access restrictions; and to mark monitoring locations for landfill covers.

Section 3.3.1

Item #1 mentions only the risk from Pu in the Wind Blown EU. As mentioned in Section 2.1 and footnote #3, three other contaminants with risks above 1×10^{-6} were also identified in the CRA. This statement needs to be qualified.

Section 3.3.2 - Item #3

Should the effluent at the 3 groundwater treatment systems also meet the substantive NPDES requirements?

Section 3.3.3 – Item #2

The next to last sentence should be qualified:

“But, excavations below three feet are not likely under a WRW scenario

Section 3.3.3 – Item #3

“Plutonium” is misspelled in the first sentence.

Section 3.3.3 – Item #4

The term, “discharge points”, in the first element should be explained/clarified. If this refers to discharge of groundwater to surface water, another term should be used.

The only “source area enhancements” I am aware of is the application of HRC. This could be made less cryptic by mentioning HRC by name or by using a term like, “VOC source area degradation enhancements.”

Section 3.3.4

The only items that deal with treatment are #2, the last sentence in #3, and #5 (which could include #6).

Section 3.4.4

The second sentence does not address the reduction of TMV through treatment.

Sections 3.3.8, 3.3.9, 3.4.8, 3.4.9, 3.5.8, 3.5.9, 4.1.8, 4.1.9

Explain how and when the text for the State Acceptance and Community Acceptance sections will be created.

Section 4.1.1

The first bullet should be qualified:

“...protective of human health since the risk to anticipated future users falls within...”

Section 4.1.2

In the first sentence of the third paragraph, change “Alternative 2” to “Alternatives 2 and 3.”

Section 4.1.4

Several of the elements mentioned in the first paragraph do not directly result in reduction of TMV or they have nothing to do with treatment.

Figures 2.1 – 2.4

The text does not explain the exceedances outside of the outline of the DOE-retained area.